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August 5, 2002

Via Electronic Filing
Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th St., SW, Room TWB-204
Washington, DC 20554

Re: <u>In the Matter of Numbering Resource Optimization</u>, CC Docket No. 99-200 (Petition for Reconsideration);

Dear Ms. Dortch:

On Friday August 2, 2002, I met with Matthew Brill, Legal Adviser to Commissioner Abernathy, discuss issues related to AT&T's Petition for Reconsideration of the <u>Numbering Resource Optimization</u> Order issued by the Commission originally on December 28, 2001 for all of the reasons contained therein. I stressed the fact that permitting incumbent LECs (and only incumbent LECs) to recover carrier specific costs of thousand block number pooling through switched access charges (services purchased only by interexchange carriers) constitutes an implicit subsidy mechanism that is prohibited by the Act and that violates the requirement for a competitively neutral cost recovery mechanism.

The positions expressed by AT&T were consistent with those contained in the Comments and ex parte filings previously made in the aforementioned dockets. One copy of this Notice is being submitted for each of the referenced proceedings in accordance with the Commission's rules.

Very truly yours,

Købert W. Zuinn).

cc: Matthew Brill